

FILED

DEC 11 2017

3/12 pm

CLERK, U.S. DISTRICT COURT

By _____

Deputy

SJW/JO
ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA §

§

v. §

Case No.: 4:17-CR-158-A

§

MICHAEL RUDDELL §

§

MOTION FOR LEAVE TO SUBMIT OBJECTIONS TO THE PSR OUT OF TIME

To the Honorable John H. McBryde:

Steve Jumes, defendant, moves the Court to extend its deadline for submission of an Objection to the PSR to December 12, 2017.

The Court's Sentencing Scheduling Order [dckt. # 102] (the Order) provided deadlines regarding various submissions. Specifically, Objections were to be submitted by December 4, 2017.

Further, counsel filed a report of no objections to the PSR dated November 24, 2017. This was done after multiple reviews of the PSR with Mr. Ruddell.

Unfortunately, counsel for the first time noticed what he believes to be an error in the PSR on December 11, 2017.

Thus, defense counsel requests leave to submit objections on behalf of Mr. Ruddell to December 12, 2017.

Sentencing is currently set for January 12, 2018. Counsel is hopeful that the requested extension will not cause the Court or the prosecution an undue hardship.

DEFENDANT'S MOTION FOR LEAVE TO FILE OBJECTIONS OUT OF TIME

Respectfully submitted,



Steve Jumes

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COUNSEL FOR DEFENDANT

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he sent a copy of the above and foregoing Defendant 's Motion for Leave to File Objections to Assistant United States Attorney Shawn Smith via email on December 11, 2017, as well as inquired his position on this submission. Mr. Smith indicated that he does not object to the motion.



Steve Jumes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and Defendant 's Motion for Leave Objections was served on Assistant United States Attorney Shawn Smith and United States Probation Molly Mouret by hand delivery on December 11, 2017.



Steve Jumes